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UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF OHIO

JULIE KELLY, an individual

Plaintiff

v.

FIRST DATA CORPORATION, a
Delaware corporation;

FRANK BISIGNANO, an individual;

ROBIN ORDING, an individual;

JACKSON LEWIS PC, a Pennsylvania
professional corporation;

MATTHEW BYRNE, an individual;

SAUL EWING ARNSTEIN & LEHR, a
Delaware limited liability partnership; and

GILLIAN COOPER, an individual

Defendants.

Civil Case No. 1:19-cv-00372-SJD-SKB

**MOTION TO REQUEST ADDITIONAL
TIME TO RESPOND TO DEFENDANTS
MOTIONS TO DISMISS**

MOTION TO REQUEST ADDITIONAL TIME TO RESPOND TO DEFENDANTS

MOTIONS TO DISMISS

I am Julie Kelly, plaintiff in this case (“Plaintiff”), and representing myself *pro se*. I filed a Complaint against the Defendants on May 20, 2019 [Docket No. 1]. I request an extension of time to file my responses to the motions to dismiss miss the Complaint. I can have my response done and filed by September 3, 2019.

I have received three separate Motions to Dismiss the Complaint [Docket Nos. 17, 20 & 22] written in defense of the Defendants (one being largest payment processor in the world, two large law firms, and their employees) and they have made very technical legal arguments. I thought my work would be complete by August 20, 2019 to file my responses to these motions. I am not a lawyer and I do not have forms to re-use like these firms do. I am needing to read the cases these firms are quoting and do my own research because some of the cases they cite do not say what they say they say. This extension will not harm these companies.

It took each of the Defendants two months to write the motions – with three motions, that is nearly six-months of lawyer work to complete them. I am asking for an extension to file mine to all three so that I have five-weeks to answer three motions that took professional lawyers two-months to complete. No harm will be done by granting me more time.

DATED: August 20, 2019

Respectfully Submitted,

/s/ Julie Kelly
Julie Kelly, Plaintiff (Pro Se)